



Via ECFS

September 13, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex Parte Notice:* GN Docket No. 16-142, *Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard*

Dear Ms. Dortch:

In an *ex parte* communication dated September 11, 2017, T-Mobile USA, Inc. (“T-Mobile”) submitted a “White Paper” noting what it claims are “complications” associated with ATSC 3.0 implementation in mobile devices.¹ ONE Media, LLC (“ONE Media”) takes this opportunity to make several salient observations with respect to T-Mobile’s filing.

- ***T-Mobile’s ex parte filing is based on a red herring.*** The Next Gen TV rulemaking proceeding contemplates a voluntary deployment of the Next Gen TV standard by broadcasters, and neither the petitioners for the rulemaking nor any broadcasters to our knowledge has advocated for a tuner mandate in fixed or mobile devices. We believe the marketplace is the appropriate venue to meet the burgeoning opportunities created by Next Gen TV and intend to pursue those opportunities notwithstanding T-Mobile’s reticence. Nothing mandates that T-Mobile incorporate Next Gen TV capabilities in devices designed for T-Mobile’s customers; if T-Mobile doesn’t want to compete, it does not have to.
- ***The complexity of designing mobile devices is a challenge worth pursuing.*** T-Mobile discusses in detail the challenges associated with mobile device design to support Next Gen capabilities over 600 MHz spectrum. But delivery of broadcast video to mobile devices in the UHF-TV band is not new. It has been successfully demonstrated as far back as 2007.² Additionally, T-Mobile should be ready to address the challenges of building receivers for the 600 MHz band, since it also must do so for its own services that it plans to deliver over the same 600 MHz spectrum that it just acquired for \$8 billion in the incentive auction. The antenna size, for example, is no different for T-Mobile than it is for any broadcasters deploying Next Gen TV. If broadcasters need to design mobile devices for those channels, so does T-Mobile. The potential for dynamic competitive AND complementary services to those offered by wireless carriers is worth pursuing. ONE Media has committed to helping “seed” that process with millions of free, mobile-enabled chip sets. T-Mobile is welcome to use them.

¹ Notice of Ex Parte Communication; *Authorizing Permissive Use of the “Next Generation” Broadcast Television Standard*, GN Docket No. 16-142, T-Mobile USA, Inc., September 11, 2017.

² See, ATSC-M/H incorporated into offerings by MediaFLO, <http://www.dailywireless.org/2007/01/07/verizon-launching-mediaflo/>. See also worldwide open standards incorporating mobile video - DVB-H and T-DMB.

- ***Public safety and emergency information delivery is vastly enhanced on a broadcast platform.*** Cellular infrastructure faces significant challenges during mass emergencies like public safety crises and catastrophic weather events. Next Gen TV's capability to deliver rich media information to users on a spectrally efficient, one-to-many basis should be embraced by T-Mobile and the wireless industry in general. Next Gen TV can alleviate the burden of Internet links, photos, live video, and other rich media by pushing that content over the broadcast network, and leaving the cellular network for the two-way communications for which it is primarily designed. T-Mobile's charge that Next Gen TV's "inferior" life-saving services would not enhance public safety is simply ludicrous. Seeing live Doppler radar images, real-time weather conditions, evacuation routes, emergency center locations, in multiple languages from robust towers and backed-up transmitters is, in and of itself, a singular justification to adopt Next Gen TV. The wireless industry should welcome Next Gen TV capabilities in their devices to work in co-operation with the cell phones that can provide one-to-one communications where possible and leave the robust one-to-many information delivery to broadcasters.
- ***Competition is a good thing.*** The Commission should skeptically view T-Mobile's "White Paper" for what it is: a self-serving, protectionist attempt to prevent new entrants from competing in the mobile video marketplace. We believe there will be a robust marketplace for Next Gen TV mobile services, and that device manufacturers will find a way to meet that demand. If the mobile opportunities for Next Gen TV are sufficiently compelling, then the marketplace will respond accordingly. If T-Mobile does not want to participate, it doesn't have to.

Please contact the undersigned should you have any questions regarding this matter.

Respectfully submitted,

/s/

Jerald N. Fritz
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Strategic and Legal Affairs
ONE Media, LLC